

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	NO. 13-164-04
	:	
vs.	:	
	:	
IRINAVASSERMAN	:	

ORDER

AND NOW, this _____ day of _____, 2013 it is hereby **ORDERED** and **DECREED** that defendant's Motion To Extend Time to File Motions is **GRANTED**.

BY THE COURT:

J.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	NO. 13-164-04
	:	
vs.	:	
	:	
IRIN VASSERMAN	:	

MOTION TO EXTEND TIME TO FILE MOTIONS

AND NOW, the defendant, **IRINA VASSERMAN**, by and through his attorney, THOMAS F. BURKE, Esquire, does file the within Motion To Extend Time to File Motions and avers as follows:

1. Thomas F. Burke, Esquire has been CJA appointed to represent the defendant in the above captioned criminal matter.
2. The defendant has been indicted on alleged violations of Title 18 United States Code, Sections 1349 (Conspiracy), 1035 (false statements), 1957 (money laundering), and Title 42, Section 1320(a) (kickbacks), and aiding and abetting.
3. Counsel is not aware of any set trial date as of the filing of the within Motion.

4. An extension in time to file pre-trial motions is requested as defense counsel has not yet received discovery in this matter.
5. In order to properly prepare said motions and/or advise defendant of his options, defense counsel needs to receive and review discovery.
6. It is respectfully submitted that based upon the foregoing, that counsel would be unable to file said motions. Accordingly, it is respectfully submitted that to deny the within Motion To Extend Time to File Motions would constitute a manifest injustice.
7. It is therefore respectfully requested that the within Motion be granted.

WHEREFORE, for all of the foregoing reasons, the within Motion To Extend Time to File Motions should be **GRANTED**.

/s/ Thomas F. Burke
THOMAS F. BURKE, ESQUIRE
Attorney for Defendant

Certificate of Service

Thomas F. Burke, Esquire being duly sworn according to law, deposes and says that on the *23rd day of April, 2013* a copy of the within document was served upon the following individuals by **EFILE**:

*Beth Leahy, Esquire
United States Attorney's Office
615 Chestnut Street
Suite 1250
Philadelphia, PA 19106

All Counsel on EFILE*

/s/ Thomas F. Burke
*Thomas F. Burke, Esquire
Attorney for Defendant*